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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,)	No. CR 11-00344 SBA
)	
Plaintiff,)	STIPULATION TO CONTINUE AND
)	EXCLUDE TIME FROM JUNE 19, 2012
v.)	TO SEPTEMBER 11, 2012;
)	ORDER
MARCO SOAREZ,)	
a/k/a Hamlet Bonilla,)	Date: September 11, 2012
a/k/a Janle Alberto Bonilla Solis,)	Time: 10:00 a.m.
)	Court: Hon. Sandra Brown Armstrong
Defendant.)	

IT IS HEREBY STIPULATED, by and between the parties to this action, through their undersigned counsel, as follows:

1. The above-captioned matter was previously set on June 8, 2012 before this Court for change of plea;

2. The parties jointly request that the Court continue the matter to September 11, 2012 at 10:00 a.m., for change of plea and sentencing, and that the Court exclude time under the Speedy Trial Act, 18 U.S.C. § 3161(h)(1)(G), between the date of this stipulation and September 11, 2012;

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3. The parties have reached a plea agreement pursuant to Federal Rule of Criminal Procedure 11(c)(1)(C) and therefore request that the Court take the proposed plea agreement under submission, as well as refer the matter to the United States Probation Office for a full presentence investigation; and

4. If the Court agrees to take the parties' proposed agreement under submission, the parties agree that time should be excluded under 18 U.S.C. § 3161(h)(1)(G) based on the Court's review and consideration of the proposed plea agreement to be entered into by the defendant and the attorney for the government. A copy of the proposed plea agreement will be submitted together with the Court's courtesy copy of this stipulation.

Respectfully submitted,

Dated: June 19, 2012

/s/

MAUREEN C. ONYEAGBAKO
Special Assistant United States Attorney

Dated: June 19, 2012

/s/
JOYCE LEAVITT
Counsel for Defendant

1 **ORDER**

2 GOOD CAUSE APPEARING, IT IS HEREBY ORDERED as follows:


3 1. The hearing for change of plea and sentencing for defendant Marco Soares is
4 continued to September 11, 2012 at 10:00 a.m.;

5 2. The above-captioned matter is referred to the United States Probation Office to
6 prepare a pre-plea presentence investigation report; and

7 3. The time from June 19, 2012 to September 11, 2012, should be excluded in
8 accordance with the Speedy Trial Act, 18 U.S.C. § 3161(h)(1)(G), for consideration by the Court
9 of the parties' proposed plea agreement.

10 IT IS SO ORDERED.

11 Dated: _6/20/12_

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13 HON. SAUNDRA BROWN ARMSTRONG
14 United States District Judge
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